

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: DANIEL M. DEROSA, JR. and	:	CHAPTER 13
MELANIE L. DEROSA	:	
Debtors	:	
	:	
DANIEL M. DEROSA, JR. and	:	
MELANIE L. DEROSA	:	
Movants	:	
	:	
vs.	:	
	:	
JACK N. ZAHAROPOULOS	:	
STANDING CHAPTER 13 TRUSTEE	:	
Respondent	:	CASE NO. 4-17-bk-01953-MJC

TRUSTEE'S OBJECTION TO MOTION TO APPROVE  
SETTLEMENT OF WORKERS' COMPENSATION CASE

AND NOW, this 8th day of June, 2023, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee for the Middle District of Pennsylvania, by and through his attorney, Agatha R. McHale, and objects to Debtor's Motion to Approve Settlement of Workers' Compensation Case for the following reasons:

1. Objectant, Jack N. Zaharopoulos is the duly appointed Trustee for this case.
2. Trustee does not object to the terms of the settlement, but rather objects to the proposed distribution of the gross recovery.
3. The Motion provides for the following:

a) Gross recovery of \$90,291.28;	
b) Workers' Compensation Counsel Fees: 20%	\$15,367.46
c) Future Medical Benefits	\$13,454.00
d) Net amount to Debtor	\$61,469.82
4. Movant filed an Amended Schedule B and C on May 31, 2023 and exempted the amount of \$25,690.00.

5. Accordingly, after the payment of Counsel Fees and Future Medical Benefits, Movant should receive \$25,690.00, and the remainder of the recovery should be paid to the Trustee for the benefit of the creditors of Movant's Bankruptcy Estate.

WHEREFORE, your Trustee respectfully requests this Honorable Court to Order that Movant receive \$25,690.00 and that the net amount be paid to the Trustee.

Respectfully submitted:

Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-6097

BY: /s/Agatha R. McHale  
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 8th day of June, 2023, I hereby certify that I have served the within Objection electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Paul McElrath, Jr., Esquire  
1641 Saw Mill Run Blvd.  
Pittsburgh, PA 15210

/s/Deborah A. Behney  
Office of Jack N. Zaharopoulos  
Standing Chapter 13 Trustee